

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Daniel E. Hall, Plaintiff,
v.
Twitter Inc., Defendant.

Case No. 1:20-cv-536-SE

**ATTACHED DECLARATION TO PLAINTIFF'S MOTION TO RECUSE
HONORABLE JUDGE ELLIOT**

Plaintiff, Daniel E. Hall, ("Hall") in support of Plaintiff's Motion to Disqualify Honorable Samantha D. Elliot, hereinafter as, ("Judge Elliot"), hereby declare; 1. I am a reasonable New Hampshire resident over eighteen and have personal knowledge of facts below. If called upon to testify, I could and would testify competently as to the matters contained herein.

2. I am the plaintiff in the above captioned case and declare, certify, that I am informed as to the proceedings, and that this Declaration and Motion to Recuse are made in good faith and not for the purpose of hindrance or delay.

3. Honorable "Judge Elliot" was sworn in as an Article I District Judge on December 22, 2021. (Attached Exhibit A).

4. Upon information and belief, on or around January 3, 2022, the Court posted public notice of the re-appointment of Judge Johnstone.

5. On January 13, 2022, Plaintiff, aka Sensa Verogna, filed a comment to the Merit Selection Panel. (Attached Exhibit B). Within these comments, Plaintiff cites his [Rule 60 Motion, at 74].

6. On February 28, 2022, Plaintiff, aka Sensa Verogna, filed an amended comments to the Merit Selection Panel, (Attached Exhibit C), attaching his [Rule 59(e) Motion] objections filed in Case No. 1:21-cv-01047-LM. (Attached Exhibit D).

7. Judge Johnstone was reappointed to a second eight-year term effective June 16, 2022.

8. Upon information and belief, Judge Elliot, an Article III justice, participated in the re-appointment process of voting, in chambers, among other Article III judges, which voted to re-appoint Judge Johnstone, despite her bad behavior.

9. I believe Judge Elliot has personal knowledge she gained through her administrative position and duties within the Court as an Article III District Court Judge, in which she advocated and voted to re-appoint Magistrate Judge Johnstone, despite Judge Johnstone's past performance in promulging, implementing and managing and adoption of an unofficial alternative admission procedures or the COURT rule(s), which created a bias and unconstitutional tribunal in favor of Twitter.

10. I believe that Judge Elliot's administrative position, makes her inherently biased, personally attached to the case outcome, and also makes her a witness who possesses personal knowledge surrounding JOHNSTONES ILLEGAL POLICY , and as a result I fear that I will not receive a fair trial or a non-bias tribunal if she fails to

recuse herself from this case, as she is unlikely to be a neutral or impartial decisionmaker.

11. I believe that under Judge Elliot, in her previous participation in the panel decision, disregarded Magistrate Judge Johnstone's previous performance of disregarding New Hampshire law, disregarding US Supreme Court Rules, District Court Rules in establishing her own pro hac vice COURT rules, by promulging, implementing and managing and adoption of an unofficial alternative admission procedures or the COURT rule(s) ("ILLEGAL POLICY"), that make current pro hac vice laws and rule provisions unnecessary and for the specific reason of allowing TWITTER attorneys, from the law firm of COIE and any associated local attorney, and specifically utilized by MRAZIK and SCHWARTZ, the privilege of practicing before the COURT on 68 separate occasions, although both lacked the requirements of eligibility demanded under Local Rules ("LR") 83.1 and 83.2 to practice before the COURT and in violation of New Hampshire RSA 311:7, and for the exclusive benefit of TWITTER 58 times.

12. I believe that if Judge Elliot's dule role and previous advocating of Johnstone and Twitter when voting to re-appoint Johnstone to another term as Magistrate gives the appearance of objective bias or partiality to be constitutionally intolerable and therefore should recuse herself from this proceeding.

Respectfully,

/s/ Daniel E. Hall

Aka, Sensa Verogna

SensaVerogna@gmail.com

"I declare, certify, verify and state declare pursuant to U.S. 28 U.S Code 1746 and under penalty of perjury that the foregoing is true and correct. Signed this 30th day of October 2022 in the State of New Hampshire.

A handwritten signature in black ink, appearing to read "D. F. Hall", written over a horizontal line.

Daniel F. Hall

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of October 2022, the foregoing document was made upon the Defendant, through its attorneys of record to Jonathan M. Eck jeck@orr-reno.com and Julie E. Schwartz, Esq., JSchwartz@perkinscoie.com and Indraneel Sur, Lead Attorney. U.S. DOJ, indraneel.sur@usdoj.gov